

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiffs,

v.

COMMONWEALTH OF PUERTO RICO,
et. al.

Defendants.

CIVIL NO. 12-2039 (GAG)

MOTION IN COMPLIANCE WITH COURT ORDER

TO THE HONORABLE COURT:

COMES NOW the COMMONWEALTH OF PUERTO RICO and the PUERTO RICO POLICE DEPARTMENT, through the undersigned counsel, and respectfully alleges and prays as follows:

1. On August 1, 2016, this Honorable Court issued a Transition Order to mitigate and prevent any undue interruption in operations or abrupt turnover in personnel that is likely to set back the Commonwealth's efforts to implement key civil rights reforms at PRPD. (See Docket No. 388).

2. In compliance with the aforementioned court order, the PRPD is submitting to the Court a list of existing PRPD personnel in the Reform Unit and SAEA, including contract staff, who the Superintendent has designated as critical to the successful implementation of the Agreement and the comprehensive reform of PRPD, pursuant to Paragraph 233 of the Agreement as **Exhibit 1 and 2**.

3. Also, the court ordered to notify the steps that the Commonwealth has taken or will take to retain personnel in the Reform Unit and SAEA who are designated as critical through June 30, 2017, pursuant to Paragraph 233 of the Agreement. (See Docket No. 388).

4. Consequently, the PRPD informs that professional service contracts that are in place have an effective term through June 30, 2017, which complies with this Court's Transitional Order; and as for the career employees, the PRPD understands that their respective functions will not be interrupted, but will take the necessary steps to prohibit the transfer or reassignment of personnel from the Reform Unit or SAEA without just cause.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In Cuzco, Peru, on September 30, 2016.

CÉSAR R. MIRANDA RODRÍGUEZ
Secretary of Justice

MARTA ELISA GONZÁLEZ Y.
Deputy Secretary
General Litigations Office

WANDYMAR BURGOS VARGAS
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